

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
)	
Schools and Libraries)	CC Docket No. 02-6
Universal Service Support Mechanism)	
)	
Request for Review and/or Waiver by)	
the Turner (Kansas) Unified School District)	Application No. 981057
of a Funding Decision by the)	
Universal Service Administrative Company)	
)	

**REQUEST FOR REVIEW AND/OR WAIVER
BY THE TURNER (KANSAS) UNIFIED SCHOOL DISTRICT
OF A FUNDING DECISION BY THE
UNIVERSAL SERVICE ADMINISTRATIVE COMPANY**

Pursuant to sections 54.719 and 54.722 of the Commission's rules,¹ the Turner (Kansas) Unified School District² (Turner USD) hereby respectfully requests a review of a Universal Service Administrative Company (USAC) decision to deny Schools and Libraries Universal Service (E-rate) funding for Funding Year 2014. The Wireline Competition Bureau's recent *Ada Order* granted a blanket waiver for applicants whose invoices in 2016 could not be timely filed due to delays in USAC's processing of their Forms 498. Turner USD falls into this category and is therefore eligible for the waiver granted in the *Ada Order*. Turner USD refiled its invoice with USAC by the April 19, 2017 deadline established in the *Ada Order* and reached out to USAC to confirm that, in the wake of the *Ada Order*, USAC would accept Turner USD's refiled BEAR form. Because USAC denied the invoice yet again, Turner USD files the instant appeal and

¹ 47 C.F.R. § 54.719(b), (c); 47 C.F.R. § 54.722(a).

² Billed Entity Number 137615.

respectfully requests that, consistent with the *Ada Order*, the Bureau reverse USAC's denial and allow Turner USD to be reimbursed for the amount requested on its BEAR form.

I. BACKGROUND

Turner USD is located in Kansas City, Kansas, and consists of four elementary schools, one sixth grade school, one middle school, one alternative high school, and one high school.

Turner USD's discount rate for funding year 2014 was 87 percent.

On February 24, 2016, Turner USD filed a Billed Entity Application for Reimbursement (BEAR) form with USAC for funding year 2014.³ In response, USAC sent Turner USD a partial denial notification letter on May 27, 2016, denying approximately \$10,000 in funding.⁴ Turner USD filed an appeal on July 21, 2016.⁵ USAC granted that appeal on August 17, 2016, and gave Turner USD 30 days to submit a new BEAR form.⁶

On August 31, 2016, in preparation for submitting a new BEAR form, Turner USD filed a Form 498.⁷ Turner USD had no reason to file an FCC Form 498 prior to the grant of the appeal because in funding year 2014, applicants could not receive reimbursement directly, but had to receive reimbursement through their service providers.⁸ At that time, Turner USD contacted USAC staff and was told that it would receive a Form 498 banking information verification email. A week later, Turner USD had received no email, so it contacted USAC

³ Exhibit 1 (February 2016 BEAR Submission). The new applicant BEAR process did not start until July 1, 2016.

⁴ Exhibit 2 (May 2016 Form 472 (BEAR) Notification Letter).

⁵ Exhibit 3 (July 2016 Appeal).

⁶ Exhibit 4 (August 2016 Administrator's Decision on Appeal).

⁷ Exhibit 5 (Turner USD Form 498).

⁸ *Modernizing the E-rate Program for Schools and Libraries*, WC Docket No. 13-184, Report and Order and Further Notice of Proposed Rulemaking, 29 FCC Rcd 8870, 8963-65 ¶¶ 233-237 (2014) (revising invoicing rules to allow applicants to request reimbursement directly from USAC); 47 C.F.R. § 54.514.

again on September 7, 2016, and reminded USAC staff that its BEAR was due on September 16. Between September 8 and September 14, Turner USD had a series of exchanges with USAC staff regarding additional verification documents that USAC required before issuing the 498 ID that Turner USD would need to file its BEAR form.⁹ By September 14, Turner USD had completed all of the paperwork required to process its Form 498.

On September 16, 2016, the day its BEAR was due, Turner USD still had not received its 498 ID, so it filed an invoice deadline extension request with USAC.¹⁰ Five days later, on September 21, Turner USD received its 498 ID and promptly filed its BEAR the same day.¹¹

On September 28, 2016, USAC denied Turner USD's BEAR on the ground that it had been filed late.¹² On October 3, 2016, USAC also denied Turner USD's invoice deadline extension request, on the ground that "current deadline extension rules and procedures do not allow approval for the reason submitted."¹³

On December 2, 2016, Turner USD filed a timely appeal with USAC of the denial of its invoice deadline extension request.¹⁴ On March 6, USAC denied Turner USD's appeal.¹⁵ The Wireline Competition Bureau issued the *Ada Order* on March 16, 2017, allowing affected

⁹ These contacts were between USAC and Turner USD's consultant, Ryan Martin of eRate Solutions. USAC staff informed Mr. Martin that it had been sending correspondence to Turner USD's general counsel, Scott Keberlein. Once Mr. Martin learned this, Turner USD was able to submit all of the documentation that USAC required.

¹⁰ Exhibit 6 (Invoice Deadline Extension Request).

¹¹ Exhibit 7 (September 2016 BEAR Submission).

¹² Exhibit 8 (September 2016 Form 472 (BEAR) Notification Letter).

¹³ Exhibit 9 (USAC Denial of Invoicing Deadline Extension Request).

¹⁴ Exhibit 10 (Letter of Appeal).

¹⁵ Exhibit 11 (Administrator's Decision on Appeal). Requests for review or waiver of USAC's decision are due within 60 days under the Commission's rules, and, as such, this appeal is timely filed. *See* 47 C.F.R. § 54.720(a).

applicants to refile their invoices within 30 days of the release of the order.¹⁶ Because Turner USD believes it qualified for the relief granted by the Commission in the *Ada Order*, Turner USD refiled its BEAR form on April 18, 2017, before the deadline established by the Commission in the order.¹⁷ On April 26, 2017, USAC denied the invoice as untimely filed, without addressing whether it fell within the *Ada Order*.¹⁸

II. TURNER USD’S CIRCUMSTANCES FALL WITHIN THE BLANKET WAIVER ISSUED BY THE BUREAU IN ITS *ADA ORDER*

On March 16, 2017, the Bureau’s *Ada Order* essentially granted a blanket waiver to all applicants who were unable to file their BEAR forms by the September 2016 deadline due to delays in receiving their 498 IDs from USAC.¹⁹ Turner USD’s BEAR form submission was within the timeframe during which the Bureau found a blanket waiver to be justified. Accordingly, Turner USD qualifies for the waiver announced in the *Ada Order*. Turner USD has refiled its invoice with USAC and has reached out to USAC to confirm that in the wake of the *Ada Order* USAC will accept Turner USD’s refiled BEAR form. Out of an abundance of caution, Turner USD files the instant appeal because USAC has not yet replied, and respectfully requests that the Bureau reverse USAC’s denial and allow Turner USD to be reimbursed for the amount requested on its BEAR form.

In the *Ada Order*, the Bureau explained that changes to the invoicing process adopted in the *First Modernization Order*—specifically, allowing applicants to seek direct reimbursement

¹⁶ *Request for Review and/or Waiver of Decisions of the Universal Service Administrator by Ada Public Library*, CC Docket No. 02-6, Order, 32 FCC Rcd 1909 (Wireline Comp. Bur. 2017) (*Ada Order*).

¹⁷ Exhibit 12 (BEAR filed April 18, 2017). Turner USD also submitted a question via the Client Services Bureau to alert USAC as to this issue. Exhibit 13 (CSB inquiry 22-940942 dated April 18, 2017).

¹⁸ Exhibit 14 (BEAR Notification Letter, dated April 26, 2017).

¹⁹ *See Ada Order*.

and moving to online filing—“caused a dramatic, one-time increase in FCC Form 498 filings . . . at USAC in the four-month period before the invoicing deadline.”²⁰ This influx, the Bureau explained, caused delays in the issuance of Form 498 IDs and PINs, the result of which was that some applicants lacked the necessary information to file their invoices by the deadline.²¹ The Bureau concluded that it would be “contrary to the public interest if applicants who made an effort to comply with the requirements prior to the deadline, but were impacted by a delay from USAC resulting from these one-time changes to the invoicing process, are unable to file their invoices.”²² For that reason, the Bureau “waive[d] section 54.514(b) and direct[ed] USAC to provide applicants that had pending requests for an FCC Form 498 ID as of October 31, 2016 with a 30-day extension of the invoice filing deadline, if the applicant did not already request an extension.”²³ For applicants that had been granted an extension, the Bureau directed USAC “to provide the applicant with 30 days to file the BEAR form after the issuance of the FCC Form 498 ID or the PIN.”²⁴

Under the terms of the *Ada Order*, Turner USD should be similarly granted a waiver, and USAC should accept its BEAR form and disburse the requested funding. Like the applicants in the *Ada Order*, Turner USD was prevented from filing its BEAR form by the deadline USAC had established because it had not received its 498 ID from USAC. And USAC’s delay in issuing the 498 ID to Turner USD occurred within the four-month period that the Bureau

²⁰ *Id.* at 1910 ¶ 5.

²¹ *Id.* at 1911 ¶ 6.

²² *Id.*

²³ *Id.*

²⁴ *Id.*

identified as an extraordinarily busy time for USAC, presenting “extraordinary circumstances that warrant a deviation from the rule.”²⁵

The sole reason that USAC identified as grounds for denying Turner USD’s BEAR form was that it had been filed late.²⁶ As explained above, Turner USD’s BEAR form was late only because of delays in receiving its 498 ID, and because USAC also denied its invoice deadline extension request. As with the *Ada Order* applicants, USAC did not believe that it had the authority to extend the invoice deadline. The only material difference between Turner USD’s circumstances and the circumstances of the applicants to whom waivers were granted in the *Ada Order* is that Turner USD’s BEAR form was for funding year 2014 rather than 2015, because—as explained above—Turner USD had won an appeal in August 2016 and had been given 30 days to file a new BEAR form. As such, Turner USD had a slightly earlier invoice deadline than the *Ada Order* applicants. But this should not change the outcome, given that the delay in receiving its 498 ID was still within the four-month busy period that justified the waiver for the *Ada Order* applicants, and Turner USD experienced the same delays in receiving its 498 ID. Because Turner USD’s circumstances cannot be meaningfully distinguished from the circumstances addressed in the *Ada Order*, this appeal should be granted.

III. A WAIVER OF THE COMMISSION’S RULES IS IN THE PUBLIC INTEREST

As we have explained, Turner USD should be entitled to a waiver to the same extent that entities whose invoices for funding year 2015 were due September 30, 2016 were given a waiver in the *Ada Order*. If, however, the Bureau concludes that Turner USD does not qualify for the

²⁵ *Id.*

²⁶ *See* Exhibit 8.

Ada Order waiver, Turner USD respectfully requests that the Bureau waive the invoice deadline rule nonetheless, because such a waiver is in the public interest.

Any of the Commission's rules may be waived if good cause is shown.²⁷ The Commission may exercise its discretion to waive a rule where the particular facts make strict compliance inconsistent with the public interest.²⁸ In addition, the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.²⁹

The public interest considerations that the Bureau identified in the *Ada Order* apply equally here. As the Bureau said, it would be “contrary to the public interest if applicants who made an effort to comply with the requirements prior to the deadline, but were impacted by a delay from USAC resulting from these one-time changes to the invoicing process, are unable to file their invoices.”³⁰ This analysis certainly applies to Turner USD, whose BEAR form was filed late only because it had not received its 498 ID from USAC. In addition, Turner USD's BEAR was filed only five days late. Under these circumstances, a waiver is every bit as much in the public interest as it was in the *Ada Order*.

²⁷ 47 C.F.R. § 1.3.

²⁸ *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (Northeast Cellular).

²⁹ *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular*, 897 F.2d at 1166.

³⁰ *Id.*

IV. CONCLUSION

For the foregoing reasons, Turner USD respectfully asks the Bureau to grant this request for review and/or waiver and direct USAC to accept Turner USD's refiled BEAR form for funding year 2014.

Respectfully submitted,

/s/ Gina Spade

Gina Spade
Broadband Legal Strategies
1629 K Street, NW Suite 300
Washington, DC 20006
DC Bar # 452207
gina@broadbandlegal.com
202-907-6252

May 5, 2017

CERTIFICATE OF SERVICE

This is to certify that on this 5th day of May, 2017, a true and correct copy of the foregoing Request for Review was sent via email to:

Schools and Libraries Division, Universal Service Administrative Company,
Appeals@sl.universalservice.org

/s/ Theresa Schrader

Attachments

Affidavit of Ryan Martin

Exhibit 1: February 24, 2016 BEAR Submission.

Exhibit 2: May 27, 2016 Form 472 (BEAR) Notification Letter.

Exhibit 3: July 21, 2016 Appeal.

Exhibit 4: August 17, 2016 Administrator's Decision on Appeal.

Exhibit 5: Turner USD Form 498, dated August 31, 2016.

Exhibit 6: Invoice Deadline Extension Request, dated September 16, 2016.

Exhibit 7: September 21, 2016 BEAR Submission.

Exhibit 8: September 28, 2016 Form 472 (BEAR) Notification Letter.

Exhibit 9: USAC Denial of Invoicing Deadline Extension Request, dated October 3, 2016.

Exhibit 10: December 2, 2016 Letter of Appeal.

Exhibit 11: Administrator's Decision on Appeal, dated March 6, 2017.

Exhibit 12: BEAR filed April 18, 2017.

Exhibit 13: CSB inquiry 22-940942 dated April 18, 2017.

Exhibit 14: BEAR Notification Letter, dated April 26, 2017.

Affidavit of Ryan Martin

STATE OF KANSAS)

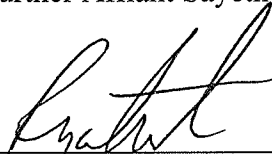
) SS

COUNTY OF DOUGLAS)

I, Ryan Martin, swear:

1. That I am an Owner at eRate Solutions, LLC, which has served as the E-rate consultant for Turner Unified School District 202 since 2005. I managed the submissions and correspondence described in the foregoing appeal.
2. That I have read the foregoing appeal and avow the information stated therein is true and correct to the best of my knowledge and belief.

Further Affiant Sayeth Not.

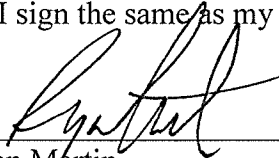


Ryan Martin
eRate Solutions, LLC
P.O. Box 1426
Lawrence, KS 66044

VERIFICATION

STATE OF KANSAS)
) SS
COUNTY OF DOUGLAS)

COMES NOW, Ryan Martin, and being first duly sworn upon my oath, state that I have read the foregoing Affidavit, and that the facts contained therein are true and correct to the best of my knowledge, information and belief, and that I sign the same as my free act and deed.



Ryan Martin

On this 5th day of May, 2017, before me, a Notary Public in and for said state, personally appeared Ryan Martin, known to me to be the person who executed the within Affidavit, and acknowledged to me that he executed the same for the purposes therein stated and that he executed the same as his free act and deed.



Notary Public

My Commission Expires: 7/26/19

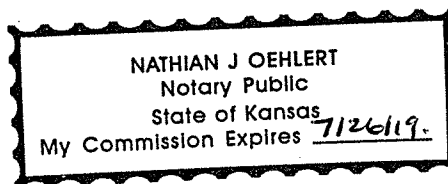


Exhibit 1

February 24, 2016 BEAR Submission

Need Help?

BEAR Home  New BEAR Form  Track Form  Bulk Download  Terms and Conditions  Logout

View BEAR Invoice

 PRINTABLE PAGE

The following invoice has been successfully submitted for certification:

Invoice ID: 2350089

Created on 2/24/2016 8:27 PM

Last updated on 2/24/2016 8:27 PM

Applicant Form Identifier TWC-2014

Block 1: Header Information

Need Help?

1. Billed Entity Name	2. Billed Entity Number	3. Service Provider
TURNER UNIFIED SCHOOL	137615	Identification Number (SPIN)
DIST 202		143028429

4. Contact Name	RYAN MARTIN
5. Contact Telephone Phone	(785) 840-0100 ext. 102
Contact Fax	(785) 749-7381
Contact Email	ryanmartin@eratesolutions.com

6. Total Reimbursement Amount
(total from Block 2, Column 14)
\$ 137355.35

Block 2: Line Item Information Per Funding Request Number

Need Help?

7. FCC Form 471 Application Number	8. Funding Request Number (FRN)	10. Customer Billed Date	11. Shipping date to Customer or Last Day of Work Performed (mm/dd/yyyy)	12. Total (Undiscounted) Amount for Service	13. Discount Rate	14. Discount Amount Billed to USAC (Column 12 multiplied by Column 13)	Approval Status
(from Funding Commitment Decision Letter)	(from Funding Commitment Decision Letter)						
1) 981057	2682053	7/1/2014		\$ 114679.71	87	\$ 99771.35	AWAITING SP CERTIFICATION
2) 981057	2682072	7/1/2014		\$ 43200.00	87	\$ 37584.00	AWAITING SP CERTIFICATION

Block 3: Billed Entity Certification

Need Help?

Contact Information for Billed Entity Authorized Person:

By logging into your account using your PIN, checking this box, and clicking the "certify" button at the end of the form, you have electronically signed the form. You are reminded that an electronic signature is the same as a handwritten signature on the form. To see a copy of the Terms and Conditions to which you previously agreed, please click on the "Terms and Conditions" menu above.

Submission Date 2/24/2016

17. Name SCOTT KEBERLEIN
18. Title/Position TECHNOLOGY SUPERVISOR
20. Address 1 800 S. 55TH ST
Address 2
City KANSAS CITY
State KS
Zip Code 66106 -

19. Phone Number (913) 288-4162
19a. Fax Number (785) 749-7381
19b. Email ryanmartin@eratesolutions.com
19c. Name of Authorized Person's Employer TURNER USD 202

27. Applicant Remittance Information
Name SCOTT KEBERLEIN
Title/Position TECHNOLOGY SUPERVISOR
Phone Number (913) 288-4162
Address 1 800 S. 55TH ST
Address 2
City KANSAS CITY
State KS
Zip Code 66106

Additional Comments:

OMB Number 3060 - 0856 Form 472

[SLD Home](#) | [Contact Us](#)

Client Service Bureau: 1-888-203-8100

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Exhibit 2

May 27, 2016 Form 472 (BEAR) Notification Letter



Universal Service Administrative Company

Schools and Libraries Division

Form 472 (BEAR) Notification Letter

May 27, 2016

David Lafrance
Time Warner Cable Business LLC
13820 Sunrise Valley Drive
9th floor
Herndon, VA 20171

Re: Invoice Number - as assigned by USAC: 2350089
Service Provider Identification Number: 143048275
Reimbursement Form Number: TWC-2014
Billed Entity Number: 137615

RYAN MARTIN
TURNER UNIFIED SCHOOL DIST 202
P.O. BOX 1426
LAWRENCE, KS 66044

Preferred Mode of Contact: Phone at (785) 840-0100 Ext: 102
Total Amount of Reimbursement Approved for Payment: \$127051.16

This letter is your notification that the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has processed an FCC Form 472, "Billed Entity Applicant Reimbursement (BEAR)" Form from the above named applicant listing you as the service provider. USAC has committed to reimburse the discounted portion of the cost of eligible services provided to eligible entities pursuant to one or more FCC Forms 471, "Description of Services Ordered and Certification Form".

In certain instances, a line may not have been paid. Review the BEAR Letter Applicant Reimbursement Report (Report) following this letter for the reason(s) this may have occurred. For more information about lines that have not been paid, see the explanation of Invoice Error Codes in Step 9 on our website. Work with the applicant (your customer) to correct any errors. Once corrected, your customer may submit a new BEAR to request reimbursement for any unpaid lines.

We recommend using the BEAR Online tool from the Apply Online area or Required Forms section of our website for additional submissions. If a new BEAR cannot be submitted before the invoice deadline passes, you or your customer may submit a request for a deadline extension. (See "Invoice Deadlines and Extension Requests" posted in the SLD section of our website for more information.)

Pursuant to the Federal Communication Commission's (FCC) Second Report and Order and Further Notice of Proposed Rulemaking (FCC 03-101, released April 29, 2003), you must remit the amount shown as "Total Amount of Reimbursement Approved for Payment" above to your customer no later than 20 days after receipt of payment of the approved discounts from USAC. You also agreed not to tender or make use of the payment of the approved discounts issued by USAC to you prior to remitting the discount to your customer (See BEAR Form, Block 4, Service Provider Acknowledgment).

The USAC check should be mailed to the service provider named above within 20 days of the date of this letter.

Schools and Libraries Division - Correspondence Unit
30 Lanidex Plaza West, PO Box 685, Parsippany, NJ 07054-0685
Visit us online at: www.usac.org/sl

The maximum remaining amount available for each Funding Request Number (FRN) listed on the Report will be the original commitment less the amount approved herein for reimbursement and less any earlier disbursements to your customer.

PLEASE NOTE: The type of invoice form (BEAR or SPI) for the funding year is established by the receipt and approval of the first invoice submitted for the FRN for the funding year. For example, if we successfully process a BEAR for an FRN, we will not approve a SPI for that same FRN at a later time.

Please see the Guide to Letter Reports posted on our website for an explanation of the items listed in the attached Report.

COMPLETE PROGRAM INFORMATION is posted on our website. You may also contact our Client Service Bureau using the "Submit a Question" link on our website, toll-free by fax at 1-888-276-8736 or toll-free by phone at 1-888-203-8100.

Schools and Libraries Division
Universal Service Administrative Company

CC: TURNER UNIFIED SCHOOL DIST 202

BEAR NOTIFICATION LETTER APPLICANT REIMBURSEMENT REPORT



Form 471 Application Number: 981057
Funding Request Number: 2682053
Funding Year 2014: 07/01/2014 - 06/30/2015
Contract Number: N/A
Funding Commitment Decision: \$99992.23
Reimbursement Amount for this FRN: \$91468.16
Reimbursement Request Decision Explanation:
Amount Requested Not Supported by Bill(s);

Form 471 Application Number: 981057
Funding Request Number: 2682072
Funding Year 2014: 07/01/2014 - 06/30/2015
Contract Number: N/A
Funding Commitment Decision: \$37584.00
Reimbursement Amount for this FRN: \$35583.00
Reimbursement Request Decision Explanation:
Amount Requested Not Supported by Bill(s);

Exhibit 3

July 21, 2016 Appeal

LETTER OF APPEAL

July 21, 2016

Schools and Libraries Program Correspondence Unit
Attention: Letter of Appeal
30 Lanidex Plaza West, PO Box 685
Parsippany, NJ 07054-0685

RE: Turner Unified School Dist 202
Entity Number: 137615
Form 471 Application # 981057
FRN: 2682053 and 2682072

To Whom It May Concern:

I am appealing the partial denial decision of the two FRN's on SLD Invoice #2350089. FRN 2682053 was reduced by \$8,303.19 and FRN 2682072 was reduced by \$2,001.00. The Reimbursement Request Decision Explanation for both FRN's is: Amount Requested Not Supported by Bill(s).

The original BEAR Form 472 (SLD Invoice #2350089) was reviewed by Jennifer Montesdeoca. I replied to her request for invoices on March 7, 2016. I sent her July – November 2014 Invoices and January – June 2015 Invoices (Please notify me if you would like me to provide all of those invoices again). We were missing the December 2014 Invoice due to turnover at the Business Manager position at the School District during that time. I contacted Time Warner Cable and they were only able to send me a screenshot from their system, of the charges for December 2014. I notified Ms. Montesdeoca of this in my email on March 7, 2016 and also included the screenshot from Time Warner of their billing system (Attachment A). I asked her to please contact me if the information I provided was not sufficient.

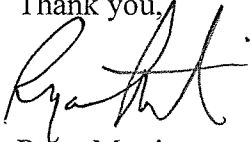
As well as sending the Time Warner screenshot for the December 2014 Invoice, I also sent a Check (Attachment B) that the School District paid to Time Warner in January 2015 for the December 2014 and January 2015 Invoices (Attachment C).

I was not able to verify from the reviewer why the dollar amounts were removed from each FRN and am therefore basing my appeal on what I am assuming happened. I also filed a request for an Invoice Deadline Extension (Attachment D) on 2/24/2016 for each FRN. The Deadline Extension Requests were denied via email on March 22, 2016, before the 472 Notification Letter (Attachment E) was sent on 5/27/2016.

I am asking that you either extend the Invoice Deadline in order to allow a resubmission of a BEAR Form 472 for the denied amounts or reopen the review on the original SLD Invoice #2350089. I specifically requested that the reviewer contact me if any additional information was needed to support the amounts filed for and I also filed an Invoice Deadline Extension request prior to the Invoice Deadline.

If you have any questions or need any additional information, please contact me.

Thank you.

A handwritten signature in black ink, appearing to read "Ryan Martin", with a stylized flourish at the end.

Ryan Martin

e-Rate Consultant for Turner Unified School Dist 202

eRate Solutions, LLC

785-840-0100

785-749-7381 (fax)

ryanmartin@eratesolutions.com

Exhibit 4

August 17, 2016 Administrator's Decision on Appeal



Universal Service Administrative Company
Schools & Libraries Division

Administrator's Decision on Appeal – Funding Year 2014-2015

August 17, 2016

Ryan Martin
Turner Unified School Dist 202
Erate Solutions, LLC
PO Box 1426
Lawrence, KS 66044

Re: Applicant Name: TURNER UNIFIED SCHOOL DIST 202
Billed Entity Number: 137615
Form 471 Application Number: 981057
Funding Request Number(s): 2682053, 2682072
Your Correspondence Received: July 21, 2016

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your appeal of USAC's Funding Year 2014 FCC Form 472 (BEAR) Notification Letter for the Application Number indicated above. This letter explains the basis of USAC's decision. The date of this letter begins the 60 day time period for appealing this decision. If your Letter of Appeal included more than one Application Number, please note that you will receive a separate letter for each application.

Funding Request Number(s): 2682053, 2682072
Decision on Appeal: **Approved**
Explanation:

- Based on your appeal letter and the relevant documentation, your appeal has been granted. You have 30 days from the date of this letter to submit an invoice.

Since your appeal is approved, you may continue to invoice USAC for a portion of the commitment that is still available, if any.

We thank you for your continued support, patience and cooperation during the appeal process.

Schools and Libraries Division
Universal Service Administrative Company

Exhibit 5

Turner USD Form 498, dated August 31, 2016



FCC FORM 498

Form #443012783

Turner Unified School District 498

Page 1 of 2

Organization Information

Name: TURNER UNIFIED SCHOOL DIST 202

Mailing Address: 800 S 55TH ST KANSAS
CITY, WYANDOTTE, KS 66106-1308

Doing Business As:

Federal EIN: 480679018

Dun and Bradstreet Number (DUNS):
067930651

FCC Registration Number: 0005598982

Remittance Contact

Same as the General Financial Contact?: No

Name: Tracy VonDerBruegge

Title: Accounting

Phone Number: 913-288-4162 Ext

Email Address:

vonderbruegget@turnerusd202.org

Holding Company

Name:

Federal EIN: 480679018

General Financial Contact

Name: SCOTT KEBERLEIN

Title: TECHNOLOGY SUPERVISOR

Phone: 913-288-4162 Ext

Email: keberleins@turnerusd202.org

Physical Address: 800 S 55TH ST KANSAS
CITY, WYANDOTTE, KS 66106-1308

Financial Institution

Remittance Financial Institution: Bank of Labor

ACH Financial Institution Number:

XXXXXXXXXX

Financial Institution Account Number for ACH:

XXXXXXXXXX

Billed Entity Number/FCC Form 498 Association

Billed Entity Number	Billed Entity Name
137615	TURNER UNIFIED SCHOOL DIST 202

Service Identification

Principal Communication Type: School/Library or other Billed Entity Recipient

Certifications

I certify that I am a School or Library Official of the above-named entity, and that I am authorized to submit this FCC Form 498 data on behalf of the above named entity.

Certifying Officer

Name: SCOTT KEBERLEIN



FCC FORM 498

Form #443012783

Turner Unified School District 498

Page 2 of 2

Phone: 913-288-4162 Ext

Email: keberleins@turnerusd202.org

Certified Timestamp

8/31/2016 9:33 AM EDT

Exhibit 6

Invoice Deadline Extension Request, dated September 16, 2016

Ryan Martin

From: sldcaseattachments@sl.universalservice.org
Sent: Friday, September 16, 2016 2:01 PM
To: ryanmartin@eratesolutions.com
Subject: SLD Inquiry #: 22-906733 Received

Thank you for using Submit a Question. This message serves as a receipt confirmation of your submission.

The case number for your submission is 22-906733.

Please refer to this case number in subsequent contacts regarding this issue. Note that we may need to ask you for additional information to completely answer your question or fulfill your request.

You indicated in your submission that you wish to send us an attachment. To submit an attachment, please reply to this message and attach your attachment to the reply. Any additional information you wish to provide should be included in the attachment, not added to the text of this email.

If you still have questions about this issue after you review our response, please call us at 1-888-203-8100. Please do not reply to this message or to our response, as replies go to an unattended mailbox.

If you have a new question or issue, please submit another question and we will create a new case number to address it.

If you need program information, you can visit the SLD web site at www.usac.org/sl.

Thank you.

Here is the information you submitted:

[FirstName]=Ryan [LastName]=Martin [JobTitle]=[EmailAddress]=ryanmartin@eratesolutions.com
[WorkPhone]=7858400100102 [FaxPhone]=7857497381 [PreviousCaseNumber]=0 [FormType]=Invoice
Extension [Owner]=DEADLINEEXTENSIONS [DateSubmitted]=9/16/2016 2:59:53 PM
[AttachmentFlag]=Y[Question2]=• Contact person name: Ryan Martin • Contact information (including email address): ryanmartin@eratesolutions.com 785-840-0100 ext 102 • FCC Form 471 Application Number: 981057 • Funding Request Number (FRN): 2682072 • Service provider name: Time Warner Cable Business LLC • Service Provider Identification Number (SPIN): 143048275 • USAC-assigned Invoice Number (if known): 2427558 • Amount of invoice: \$2,300.00 pre discount • Reason for extension request: I filed an appeal and received the Administrator's Decision on Appeal Letter, approving the appeal, on August 17, 2016. The Letter states that the BEAR Form must be filed within 30 days of the date of the Letter. I am not able to file the BEAR Form online because the Form 498 ID does not populate (see attachment). I have been in contact and working with Samantha Jones at USAC in order to get our Form 498 completed (please see attached emails). The e-mail follow up requesting the Banking Information for Turner USD 202 was not getting through to Scott Keberlein the contact at Turner USD 202. Samantha finally ended up sending us a link to upload the information and we did so on 9/14/2016 but there is still no 498 ID populating on the BEAR Form. Please allow an additional 120 day extension in order to file this BEAR Form which is the result of an appeal approval from USAC.

Exhibit 7

September 21, 2016 BEAR Submission

Need Help?

Home

 New BEAR Form

 Track Form

 Bulk Download

 Terms and Conditions

 Deadline Extension

 Logout

View BEAR Invoice

 PRINTABLE PAGE

Invoice ID: 2427558
Created on 8/31/2016 3:51 PM
Last updated on 9/23/2016 5:03 AM

Applicant Form Identifier TWC-2014.B

Block 1: Header Information

[Need Help?](#)

1. Billed Entity Name
TURNER UNIFIED SCHOOL
DIST 202

2. Billed Entity Number
137615

3. Service Provider
Identification Number (SPIN)
143048275

Applicant FCC Form 498 ID
443012783

4. Contact Name
RYAN MARTIN

5. Contact Telephone Phone
(785) 840-0100 ext. 102

Contact Fax
(785) 749-7381

Contact Email
ryanmartin@eratesolutions.com

6. Total Reimbursement Amount
(total from Block 2, Column 14)
\$ 10304.18

Block 2: Line Item Information Per Funding Request Number

[Need Help?](#)

7. FCC Form 471 Application Number (from Funding Commitment Decision Letter)	8. Funding Request Number (FRN) (from Funding Commitment Decision Letter)	9. Bill Frequency	10. Customer Billed Date	11. Shipping date to Customer or Last Day of Work Performed (mm/dd/yyyy)	12. Total (Undiscounted) Amount for Service	13. Discount Rate	14. Discount Amount Billed to USAC (Column 12 multiplied by Column 13)	Approval Status
1) 981057	2682072	OTHER	7/1/2014		\$ 2300.00	87	\$ 2001.00	COMPLETED
2) 981057	2682053	OTHER	7/1/2014		\$ 9543.89	87	\$ 8303.18	COMPLETED

Block 3: Billed Entity Certification

[Need Help?](#)

Contact Information for Billed Entity Authorized Person:

By logging into your account using your PIN, checking this box, and clicking the "certify" button at the end of the form, you have electronically signed the form. You are reminded that an electronic signature is the same as a handwritten signature on the form.

To see a copy of the Terms and Conditions to which you previously agreed, please click on the "Terms and Conditions" menu above.

Submission Date 9/21/2016

17. Name SCOTT KEBERLEIN
18. Title/Position TECHNOLOGY SUPERVISOR
20. Address 1 800 S. 55TH ST
Address 2
City KANSAS CITY
State KS
Zip Code 66106 -

19. Phone Number (913) 288-4162
19a. Fax Number (785) 749-7381
19b. Email ryanmartin@eratesolutions.com
19c. Name of Authorized Person's Employer TURNER USD 202

OMB Number 3060 - 0856 Form 472

[SLD Home](#) | [Contact Us](#)

[Client Service Bureau: 1-888-203-8100](#)

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Exhibit 8

September 28, 2016 Form 472 (BEAR) Notification Letter



Universal Service Administrative Company

Schools and Libraries Division

Form 472 (BEAR) Notification Letter

September 28, 2016

David Lafrance
Time Warner Cable Business LLC
13820 Sunrise Valley Drive
9th floor
Herndon, VA 20171

Re: Invoice Number - as assigned by USAC: 2427558
Service Provider Identification Number: 143048275
Reimbursement Form Number: TWC-2014.B
Billed Entity Number: 137615

RYAN MARTIN
TURNER UNIFIED SCHOOL DIST 202
P.O. BOX 1426
LAWRENCE, KS 66044

Preferred Mode of Contact: Phone at (785) 840-0100 Ext: 102
Total Amount of Reimbursement Approved for Payment: \$0.00

This letter is your notification that the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has processed an FCC Form 472, "Billed Entity Applicant Reimbursement (BEAR)" Form from the above named applicant listing you as the service provider. USAC has committed to reimburse the discounted portion of the cost of eligible services provided to eligible entities pursuant to one or more FCC Forms 471, "Description of Services Ordered and Certification Form".

In certain instances, a line may not have been paid. Review the BEAR Letter Applicant Reimbursement Report (Report) following this letter for the reason(s) this may have occurred. For more information about lines that have not been paid, see the explanation of Invoice Error Codes in Step 9 on our website. Work with the applicant (your customer) to correct any errors. Once corrected, your customer may submit a new BEAR using the BEAR Online tool from the Apply Online area or Required Forms section of our website to request reimbursement for any unpaid lines.

If a new BEAR cannot be submitted before the invoice deadline passes, you or your customer may submit a request for a deadline extension. (See "Invoice Deadlines and Extension Requests" posted in the SLD section of our website for more information.)

TO APPEAL THIS DECISION:

If you wish to appeal a decision in this letter to USAC, your appeal must be received by USAC or postmarked within 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. In your letter of appeal:

1. Include the name, address, telephone number, fax number, and email address for the person who can most readily discuss this appeal with us.
2. State outright that your letter is an appeal. Include the following to identify the USAC decision letter (e.g., FCDL) and the decision you are appealing:
 - Appellant name,
 - Applicant name and service provider name, if different from appellant,

Schools and Libraries Division - Correspondence Unit
30 Lanidex Plaza West, PO Box 685, Parsippany, NJ 07054-0685
Visit us online at: www.usac.org/sl

- Applicant BEN and Service Provider Identification Number (SPIN), - FCC Form 471 Application Number and the Funding Request Number (FRN) or Numbers as assigned by USAC,
- "Funding Commitment Decision Letter for Funding Year 2015," AND
- The exact text or the decision that you are appealing.

3. Please keep your letter to the point, and provide documentation to support your appeal. Be sure to keep a copy of your entire appeal, including any correspondence and documentation.

4. If you are the applicant, please provide a copy of your appeal to the service provider(s) affected by USAC's decision. If you are the service provider, please provide a copy of your appeal to the applicant(s) affected by USAC's decision.

5. Provide an authorized signature on your letter of appeal.

We strongly recommend that you use one of the electronic filing options. To submit your appeal to USAC by email, email your appeal to appeals@sl.universalservice.org or submit your appeal electronically by using the "Submit a Question" feature on the USAC website. USAC will automatically reply to incoming emails to confirm receipt.

To submit your appeal to USAC by fax, fax your appeal to (973) 599-6542. To submit your appeal to USAC on paper, send your appeal to:

Letter of Appeal
Schools and Libraries Division - Correspondence Unit
30 Lanidex Plaza West
PO Box 685
Parsippany, NJ 07054-0685

For more information on submitting an appeal to USAC, please see "Appeals" in the Schools and Libraries section of the USAC website.

The maximum remaining amount available for each Funding Request Number (FRN) listed on the Report will be the original commitment less the amount approved herein for reimbursement and less any earlier disbursements to your customer.

PLEASE NOTE: The type of invoice form (BEAR or SPI) for the funding year is established by the receipt and approval of the first invoice submitted for the FRN for the funding year. For example, if we successfully process a BEAR for an FRN, we will not approve a SPI for that same FRN at a later time.

Please see the Guide to Letter Reports posted on our website for an explanation of the items listed in the attached Report.

COMPLETE PROGRAM INFORMATION is posted on our website. You may also contact our Client Service Bureau using the "Submit a Question" link on our website, toll-free by fax at 1-888-276-8736 or toll-free by phone at 1-888-203-8100.

Schools and Libraries Division
Universal Service Administrative Company

CC: TURNER UNIFIED SCHOOL DIST 202

BEAR NOTIFICATION LETTER APPLICANT REIMBURSEMENT REPORT

Form 471 Application Number: 981057
Funding Request Number: 2682053
Funding Year 2014: 07/01/2014 - 06/30/2015
Contract Number: N/A
Funding Commitment Decision: \$99992.23
Reimbursement Amount for this FRN: \$0.00
Reimbursement Request Decision Explanation:
Invoice Received Date [09/21/2016] Later Than;

Form 471 Application Number: 981057
Funding Request Number: 2682072
Funding Year 2014: 07/01/2014 - 06/30/2015
Contract Number: N/A
Funding Commitment Decision: \$37584.00
Reimbursement Amount for this FRN: \$0.00
Reimbursement Request Decision Explanation:
Invoice Received Date [09/21/2016] Later Than;

Exhibit 9

USAC Denial of Invoicing Deadline Extension Request, October 3, 2016

Ryan Martin

From: deadline@sl.universalservice.org
Sent: Monday, October 03, 2016 2:51 PM
To: ryanmartin@eratesolutions.com
Subject: Administrator's Decision on Invoice Deadline Extension Request

This serves as acknowledgement and dismissal of your request for a deadline extension for the following FRNs:

2682053
2682072

Current deadline extension rules and procedures do not allow approval for the reason submitted.

TO APPEAL THIS DECISION:

If you wish to appeal the decision indicated in this letter, your appeal must be POSTMARKED within 60 days of the above date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. In your letter of appeal:

1. Include the name, address, telephone number, fax number, and e-mail address (if available) for the person who can most discuss this appeal with us.
2. State outright that your letter is an appeal. Identify which Administrative Decision you are appealing. Indicate the relevant funding year and the date of this letter. Your letter of appeal must also include the Billed Entity Name, the Form 471 Application Number, and the SLD Invoice Number from the top of your letter.
3. When explaining your appeal, copy the language or text from this letter that is at the heart of your appeal to allow the SLD to more readily understand your appeal and respond appropriately. Please keep your letter to the point, and provide documentation to support your appeal. Be sure to keep copies of your correspondence and documentation.
4. Provide an authorized signature on your letter of appeal.

If you are submitting your appeal on paper, please send your appeal to: Letter of Appeal, Schools and Libraries Division, 30 Lanidex Plaza West, PO Box 685, Parsippany, NJ 07054-0685. Additional options for filing an appeal can be found in the "Appeals Procedure" posted in the Reference Area of the SLD web site or by contacting the Client Service Bureau. We encourage the use of either the e-mail or fax filing options.

Schools and Libraries Division
Universal Service Administrative Company

This e-mail has been generated programmatically. Please do not respond to this e-mail.

Exhibit 10

December 2, 2016 Letter of Appeal

LETTER OF APPEAL

December 2, 2016

Schools and Libraries Program Correspondence Unit
Attention: Letter of Appeal
30 Lanidex Plaza West, PO Box 684
Parsippany, NJ 07054-0685

RE: Turner Unified School Dist 202
Entity Number: 137615
Form 471 Application # 981057
FRN: 2682053 and 2682072

To Whom It May Concern:

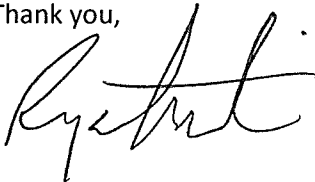
I am appealing the denial of the Deadline Extension Requests for FRN's 2682053 and 2682072 which were submitted on September 16, 2016. The Deadline Extension Requests were denied for the following reasons; "Current deadline extension rules and procedures do not allow approval for the reason submitted."

The extension is necessary as SLD Invoice # 2427558 (for FRN 2682053 and 2682072) was denied for the following reason; "Invoice Received Date [09/21/2016] Later Than FCC Extension Date [9/16/2016];80". SLD Invoice #2427558 was filed as a result of a successful appeal of SLD Invoice #2350089. The appeal was approved on August 17, 2016 and we were given 30 days from that date to file another invoice. I was not able to submit the invoice in those 30 days, prior to September 16, 2016, as USAC had not yet approved the Form 498 for Turner Unified School Dist 202, Entity # 137615. The Form 498 was submitted and certified on August 31, 2016. (Attachment A). I contacted Samantha T. Jones, Program Analyst: Schools and Libraries Program, (Attachment B - email chain with Samantha T. Jones) originally on August 31, 2016 and she informed me that there was a follow up email with additional banking verification that we would need to submit in order to complete the Form 498. The email was never received by Scott Keberlein. I contacted Samantha on September 7, 2016 when we had not received the follow up email to verify our banking information. On September 12, 2016 Samantha sent me an email with the following link, <https://efileweb.usac.org/ContributorManagement/V1/BankValidation>, in order to submit the verification of Turner USD 202's banking information. We submitted the banking information on September 14, 2016 and it was not processed until September 21, 2016. Once the Form 498 Application Number was populated on the Form 472 I proceeded to file the Form 472 on September 21, 2016.

I am asking that you allow an Invoice Deadline Extension for FRN's 2682053 and 2682072 as, through no fault of Turner USD 202, we were unable to file the Form 472 in the time frame allowed by USAC as they had not processed our Form 498.

Please contact me if you have any questions or require additional information.

Thank you,

A handwritten signature in black ink, appearing to read "Ryan Martin", with a stylized, cursive script.

Ryan Martin

E-Rate Consultant for Turner Unified School Dist 202

eRate Solutions, LLC

785-840-0100

785-749-7381 (Fax)

ryanmartin@eratesolutions.com

Exhibit 11

Administrator's Decision on Appeal, March 6, 2017



Universal Service Administrative Company
Schools & Libraries Division

Administrator's Decision on Appeal – Funding Year 2014-2015

March 06, 2017

Ryan Martin
eRate Solutions, LLC
P.o. Box 1426
Lawrence, KS 66044

Re: Applicant Name: TURNER UNIFIED SCHOOL DIST 202
Billed Entity Number: 137615
Form 471 Application Number: 981057
Funding Request Number(s): 2682053, 2682072
Your Correspondence Dated: December 02, 2016

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your appeal of USAC's Funding Year 2014 Administrator's Decision on Invoice Deadline Extension Request Letter for the Application Number indicated above. This letter explains the basis of USAC's decision. The date of this letter begins the 60 day time period for appealing this decision. If your Letter of Appeal included more than one Application Number, please note that you will receive a separate letter for each application.

Funding Request Number(s): 2682053, 2682072

Decision on Appeal: **Denied**

Explanation:

- Invoices must be postmarked no later than 120 days after the last date to receive service, or 120 days after the date of the Form 486 Notification Letter, whichever is later. You did not demonstrate otherwise in your appeal. Therefore, your appeal is denied.

Since your appeal was denied in full, dismissed or cancelled, you may file an appeal with the FCC. Your appeal must be postmarked within 60 days of the date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554. Further information and options for filing an appeal directly with the FCC can be found under the Reference

Area/"Appeals" of the SLD section of the USAC website or by contacting the Client Service Bureau. We strongly recommend that you use the electronic filing options.

We thank you for your continued support, patience and cooperation during the appeal process.

Schools and Libraries Division
Universal Service Administrative Company

Ryan Martin
eRate Solutions, LLC
P.o. Box 1426
Lawrence, KS 66044

Billed Entity Number: 137615
Form 471 Application Number: 981057
Form 486 Application Number:

Exhibit 12

BEAR filed April 18, 2017

Need Help?

Home

 New BEAR Form

 Track Form

 Bulk Download

 Terms and Conditions

 Deadline Extension

 Logout

View BEAR Invoice

 PRINTABLE PAGE

The following has been successfully certified:
Certified on 4/18/2017 1:45 PM
Invoice ID: 2570553
Created on 4/18/2017 1:45 PM
Last updated on 4/18/2017 1:45 PM

Applicant Form Identifier TWC-2014.C

Block 1: Header Information

[Need Help?](#)

1. Billed Entity Name

TURNER UNIFIED SCHOOL
DIST 202

2. Billed Entity Number

137615

3. Service Provider
Identification Number (SPIN)

143048275

Applicant FCC Form 498 ID

443012783

4. Contact Name

RYAN MARTIN

5. Contact Telephone Phone

(785) 840-0100 ext. 102

Contact Fax

(785) 749-7381

Contact Email

ryanmartin@eratesolutions.com

6. Total Reimbursement Amount
(total from Block 2, Column 14)
\$ 10304.18

Block 2: Line Item Information Per Funding Request Number

[Need Help?](#)

7. FCC Form 471 Application Number (from Funding Commitment Decision Letter)	8. Funding Request Number (FRN) (from Funding Commitment Decision Letter)	9. Bill Frequency	10. Customer Billed Date	11. Shipping date to Customer or Last Day of Work Performed (mm/dd/yyyy)	12. Total (Undiscounted) Amount for Service	13. Discount Rate	14. Discount Amount Billed to USAC (Column 12 multiplied by Column 13)	Approval Status
1) 981057	2682053	OTHER	7/1/2014		\$ 9543.89	87	\$ 8303.18	CERTIFIED
2) 981057	2682072	OTHER	7/1/2014		\$ 2300.00	87	\$ 2001.00	CERTIFIED

Block 3: Billed Entity Certification

[Need Help?](#)

Contact Information for Billed Entity Authorized Person:

By logging into your account using your PIN, checking this box, and clicking the "certify" button at the end of the form, you have electronically signed the form. You are reminded that an electronic signature is the same as a handwritten signature on the form. To see a copy of the Terms and Conditions to which you previously agreed, please click on the "Terms and Conditions" menu above.

Submission Date 4/18/2017

17. Name SCOTT KEBERLEIN
18. Title/Position TECHNOLOGY SUPERVISOR
20. Address 1 800 S. 55TH STREET
Address 2
City KANSAS CITY
State KS
Zip Code 66106 -

19. Phone Number (913) 288-4162
19a. Fax Number (785) 749-7381
19b. Email ryanmartin@eratesolutions.com
19c. Name of Authorized Person's Employer TURNER USD 202

OMB Number 3060 - 0856 Form 472

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[Client Service Bureau: 1-888-203-8100](#)

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Exhibit 13

CSB inquiry 22-940942 dated April 18, 2017

From: sldnoreply@sl.universalservice.org
To: ryanmartin@eratesolutions.com
Subject: SLD Inquiry #: 22-940942 Received
Date: Tuesday, April 18, 2017 1:39:19 PM

Thank you for using Submit a Question. This message serves as a receipt confirmation of your submission.

The case number for your submission is 22-940942.

Please refer to this case number in subsequent contacts regarding this issue. Note that we may need to ask you for additional information to completely answer your question or fulfill your request.

If you still have questions about this issue after you review our response, please call us at 1-888-203-8100. Please do not reply to this message or to our response, as replies go to an unattended mailbox.

If you have a new question or issue, please submit another question and we will create a new case number to address it.

If you need program information, you can visit the SLD web site at www.usac.org/sl.

Thank you.

Following is the information you submitted:

*[FirstName]=Ryan [LastName]=Martin [JobTitle]=
[EmailAddress]=ryanmartin@eratesolutions.com [WorkPhone]=7858400100102
[FaxPhone]=7857497381 [PreviousCaseNumber]=0 [FormType]=472 [Owner]=TCSB
[DateSubmitted]=4/18/2017 1:52:04 PM [AttachmentFlag]=N[BenOrSpinNumber]=137615
[ApplicantFormID]=TWC-2014.C [SPIN]=143048275 [FRN]=2682053
[ApplicationNumber]=2570553 [Question2]=Please escalate to a USAC Invoicing
Supervisor. I have filed SLD Invoice #2570553 for Turner USD 202. This is the 3rd invoice I
am filing for FRN's 2682053 and 2682072. The original BEAR, SLD Invoice #2350089, was
filed on 2/24/2016. The invoice was reduced by \$10,304.19. I filed an appeal with USAC
regarding this reduction and was approved on August 17, 2016. I was given 30 days to file a
new BEAR Form. However, the new BEAR Forms required a Form 498 Application ID in
order to submit them. USAC did not process the Form 498 for Turner USD 202 until after the
30 day deadline allowed by the appeal approval. I filed my second BEAR Form, SLD Invoice
#2427558, on September 21, 2016 once the Form 498 was processed by USAC and the 498 ID
was populated on the BEAR Form online. SLD Invoice #2427558 was denied as the Invoice
was received after the Last Date to Invoice. Recently, The Commission decided to: "waive
section 54.514(b) if an applicant already has received an extension, but USAC is unable to
provide the applicant with an FCC Form 498 ID or a PIN before the end of the 120-day
extension. In these cases, we direct USAC to provide the applicant with 30 days to file the
BEAR form after the issuance of the FCC Form 498 ID or the PIN." I have filed the 3rd BEAR
today, SLD Invoice #2570553, which should fall under this waiver. Please escalate this email
to USAC Invoicing in order to avoid a FCC Appeal if at all possible. Please contact me with
any questions that you may have. Thank you, Ryan Martin eRate Solutions, LLC 785-840-0100*

x 102 785-749-7381 fax ryanmartin@eratesolutions.com

Exhibit 14

BEAR Notification Letter, dated April 26, 2017



Universal Service Administrative Company

Schools and Libraries Division

Form 472 (BEAR) Notification Letter

April 26, 2017

David Lafrance
Time Warner Cable Business LLC
13820 Sunrise Valley Drive
9th floor
Herndon, VA 20171

Re: Invoice Number - as assigned by USAC: 2570553
Service Provider Identification Number: 143048275
Reimbursement Form Number: TWC-2014.C
Billed Entity Number: 137615

RYAN MARTIN
TURNER UNIFIED SCHOOL DIST 202
P.O. BOX 1426
LAWRENCE, KS 66044

Preferred Mode of Contact: Phone at (785) 840-0100 Ext: 102
Total Amount of Reimbursement Approved for Payment: \$0.00

This letter is your notification that the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has processed an FCC Form 472, "Billed Entity Applicant Reimbursement (BEAR)" Form from the above named applicant listing you as the service provider. USAC has committed to reimburse the discounted portion of the cost of eligible services provided to eligible entities pursuant to one or more FCC Forms 471, "Description of Services Ordered and Certification Form".

In certain instances, a line may not have been paid. Review the BEAR Letter Applicant Reimbursement Report (Report) following this letter for the reason(s) this may have occurred. For more information about lines that have not been paid, see the explanation of Invoice Error Codes in Step 9 on our website. Work with the applicant (your customer) to correct any errors. Once corrected, your customer may submit a new BEAR using the BEAR Online tool from the Apply Online area or Required Forms section of our website to request reimbursement for any unpaid lines.

If a new BEAR cannot be submitted before the invoice deadline passes, you or your customer may submit a request for a deadline extension. (See "Invoice Deadlines and Extension Requests" posted in the SLD section of our website for more information.)

TO APPEAL THIS DECISION:

If you wish to appeal a decision in this letter to USAC, your appeal must be received by USAC or postmarked within 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. In your letter of appeal:

1. Include the name, address, telephone number, fax number, and email address for the person who can most readily discuss this appeal with us.
2. State outright that your letter is an appeal. Include the following to identify the USAC decision letter (e.g., FCDL) and the decision you are appealing:
 - Appellant name,
 - Applicant name and service provider name, if different from appellant,

Schools and Libraries Division - Correspondence Unit
30 Lanidex Plaza West, PO Box 685, Parsippany, NJ 07054-0685
Visit us online at: www.usac.org/sl



- Applicant BEN and Service Provider Identification Number (SPIN), - FCC Form 471 Application Number and the Funding Request Number (FRN) or Numbers as assigned by USAC,
- "Funding Commitment Decision Letter for Funding Year 2015," AND
- The exact text or the decision that you are appealing.

3. Please keep your letter to the point, and provide documentation to support your appeal. Be sure to keep a copy of your entire appeal, including any correspondence and documentation.

4. If you are the applicant, please provide a copy of your appeal to the service provider(s) affected by USAC's decision. If you are the service provider, please provide a copy of your appeal to the applicant(s) affected by USAC's decision.

5. Provide an authorized signature on your letter of appeal.

We strongly recommend that you use one of the electronic filing options. To submit your appeal to USAC by email, email your appeal to appeals@sl.universalservice.org or submit your appeal electronically by using the "Submit a Question" feature on the USAC website. USAC will automatically reply to incoming emails to confirm receipt.

To submit your appeal to USAC by fax, fax your appeal to (973) 599-6542. To submit your appeal to USAC on paper, send your appeal to:

Letter of Appeal
 Schools and Libraries Division - Correspondence Unit
 30 Lanidex Plaza West
 PO Box 685
 Parsippany, NJ 07054-0685

For more information on submitting an appeal to USAC, please see "Appeals" in the Schools and Libraries section of the USAC website.

The maximum remaining amount available for each Funding Request Number (FRN) listed on the Report will be the original commitment less the amount approved herein for reimbursement and less any earlier disbursements to your customer.

PLEASE NOTE: The type of invoice form (BEAR or SPI) for the funding year is established by the receipt and approval of the first invoice submitted for the FRN for the funding year. For example, if we successfully process a BEAR for an FRN, we will not approve a SPI for that same FRN at a later time.

Please see the Guide to Letter Reports posted on our website for an explanation of the items listed in the attached Report.

COMPLETE PROGRAM INFORMATION is posted on our website. You may also contact our Client Service Bureau using the "Submit a Question" link on our website, toll-free by fax at 1-888-276-8736 or toll-free by phone at 1-888-203-8100.

Schools and Libraries Division
 Universal Service Administrative Company

CC: TURNER UNIFIED SCHOOL DIST 202

BEAR NOTIFICATION LETTER APPLICANT REIMBURSEMENT REPORT



Form 471 Application Number: 981057
Funding Request Number: 2682072
Funding Year 2014: 07/01/2014 - 06/30/2015
Contract Number: N/A
Funding Commitment Decision: \$37584.00
Reimbursement Amount for this FRN: \$0.00
Reimbursement Request Decision Explanation:
Invoice Received Date [04/18/2017] Later Than;

Form 471 Application Number: 981057
Funding Request Number: 2682053
Funding Year 2014: 07/01/2014 - 06/30/2015
Contract Number: N/A
Funding Commitment Decision: \$99992.23
Reimbursement Amount for this FRN: \$0.00
Reimbursement Request Decision Explanation:
Invoice Received Date [04/18/2017] Later Than;
